

NICK S. PUJJI (SBN 259571)
nick.pujji@dentons.com
DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, California 90017-5704
Telephone: 213 623 9300
Facsimile: 213 623 9924

Attorneys for Defendant
BPR HOTELS & RESORTS, LLC d/b/a
HOTEL LUCENT

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

FLOR JIMENEZ, an individual,

Plaintiff,

v.

BPR HOTELS & RESORTS, LLC
d/b/a HOTEL LUCENT, a California
limited liability company; and
DOES 1 to 10 inclusive,

Defendant.

Case No. 2:22-cv-01125-TLN-JDP

**FINAL-FINAL STIPULATION AND
ORDER TO EXTEND TIME TO
RESPOND TO COMPLAINT**

Action Filed: June 28, 2022

Current Response Date: December 2, 2022
New Response Date: January 3, 2023

WHEREAS, Plaintiff Flor Jimenez (“Plaintiff”) filed a Complaint on
June 28, 2022; and

WHEREAS, through the Parties’ (Plaintiff and Defendant collectively
referred to as the “Parties”) prior stipulations, the current deadline for a responsive
pleading by Defendant BPR Hotels & Resorts, LLC d/b/a Hotel Lucent
(“Defendant”) is December 2, 2022; and

WHEREAS, the Parties are continuing to investigate and review Plaintiff’s
allegations, which is a time-consuming process given the highly technical nature of
the allegations; and

WHEREAS, the Parties are conferring (including via consistent telephone
calls and email correspondences), will continue to and would like more time to

1 continue their discussions given the strong likelihood, based on ongoing
2 discussions, that the case will be dismissed within thirty (30) days;

3 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and
4 through the Parties' respective counsel as follows:

5 Defendant's deadline to file a responsive pleading to Plaintiff's Complaint
6 shall be extended by thirty-two (32) calendar days (given upcoming holidays and
7 Court and office closures) to January 3, 2023.

8 IT IS SO STIPULATED.

9
10 Dated: December 2, 2022

Respectfully submitted,

11 DENTONS US LLP

12 By: /s/ Nick S. Pujji
13 Nick S. Pujji

14 Attorneys for Defendant
15 BPR HOTELS & RESORTS, LLC d/b/a
HOTEL LUCENT

16 Dated: December 2, 2022

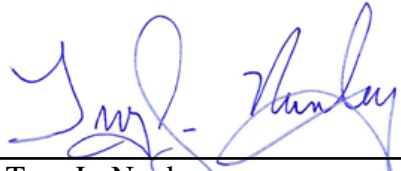
WILSHIRE LAW FIRM

17 By: /s/ Binyamin I. Manoucheri
18 Thiago M. Coelho
Binyamin I. Manoucheri

19 Attorneys for Plaintiff
20 FLOR JIMENEZ

21
22
23 IT IS SO ORDERED.

24
25 Dated: December 5, 2022

26 
27 Troy L. Nunley
28 United States District Judge

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
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